



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 8, 1999

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: Guidance Regarding a New Recommended Practice for Inspecting Internally-Lined Tanks

FROM: Sammy K. Ng, Acting Director /s/
Office of Underground Storage Tanks

TO: State UST Program Managers
EPA Regional Program Managers

A new recommended practice has been developed by Ken Wilcox Associates (KWA), Inc. titled ***Recommended Practice for Inspecting Buried Lined Steel Tanks Using a Video Camera*** (see attachment 1). Until this standard was developed, the Environmental Protection Agency's (EPA) Office of Underground Storage Tanks (OUST) was aware of only one standard, National Leak Prevention Association (NLPA) Standard 631, Chapter B, that described a procedure for the periodic inspection requirements for internally-lined underground storage tanks (USTs).

The Federal regulations at 40 CFR § 280.21(b) require the following when a periodic inspection of an internally-lined tank is conducted:

1. The inspection of the lined tank must be conducted in accordance with a code of practice developed by a nationally recognized association or independent testing laboratory.
2. The lined tank is internally inspected and found to be structurally sound with the lining still performing in accordance with original design specifications.

How does the KWA recommended practice meet each of these requirements? First, the newly developed recommended practice is a standard developed by KWA, Inc., an independent testing laboratory. Second, the KWA recommended practice performs an internal inspection by use of a video camera. Third, the recommended practice determines whether or not the lined tank is structurally sound by using tank and site-specific data and a mathematical prediction model to statistically determine the expected leak-free life of the tank. Finally, the recommended practice determines whether or not the lining is still performing in accordance with original design specifications by conducting a tightness test and performing hardness and thickness testing in

areas below the fill riser. A detailed comparison of the lining inspection requirements for each of the standards is provided in attachment 2.

After careful review of the KWA recommended practice, comparison to the NLPA standard and review of the federal regulations, EPA believes that the KWA recommended practice meets the requirements necessary for conducting inspections of internally-lined tanks as required in the federal regulations at 40 CFR § 280.21(b). In addition, EPA recommends that states review the recommended practice to determine if it meets their lining inspection requirements, if applicable under state law. EPA recognizes that states may decide not to allow use of the KWA recommended practice for the periodic inspection of internally-lined tanks under state law.

Please contact Paul Miller of my staff via E-mail at miller.paul@epa.gov or phone at (703) 603-7165 if you have questions regarding this guidance.

Attachments (2)

cc (w/o attachments): Paul Miller, OUST
OUST Management Team
Shushona Clark, Compendium
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Ken Wilcox Associates, Inc.